
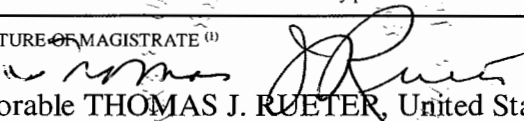


<b>United States District Court</b>		DISTRICT Eastern District of Pennsylvania	
<b>UNITED STATES OF AMERICA</b> <b>v.</b> <b>VLADIMIR LAHENS,</b> <b>RANIN ELGAMAL</b>		DOCKET NO.	
		MAGISTRATE'S CASE NO.  <b>17-830</b>	
Complaint for violation of Title 18 United States Code §§ 1344, 1028A, 2			
NAME OF JUDGE OR MAGISTRATE  Honorable THOMAS J. RUETER		OFFICIAL TITLE U.S. Magistrate Judge	LOCATION Philadelphia, PA
DATE OF OFFENSE  April 12 to April 28, 2017	PLACE OF OFFENSE  E.D. Pa. and elsewhere	ADDRESS OF ACCUSED (if known)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:  From on or about April 12, 2017 through on or about April 28, 2017, defendants Vladimir Lahens and Ranin ElGamal knowingly executed, and aided and abetted, a scheme to defraud federally insured banks, in violation of Title 18, United States Code, Sections 1344 and 2, and committed, and aided and abetted the commission of, aggravated identity theft, in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.			
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:  SEE AFFIDAVIT ATTACHED HERETO.			
MATERIAL WITNESSES IN RELATION AGAINST THE ACCUSED:			
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.		SIGNATURE OF COMPLAINANT (official title)  T. Sean Norman 	
		OFFICIAL TITLE  Special Agent, Federal Bureau of Investigation	
Sworn to before me and subscribed in my presence.			
SIGNATURE OF MAGISTRATE <sup>(1)</sup>  Honorable THOMAS J. RUETER, United States Magistrate Judge		DATE  <b>6-19-17</b>	

1) See Federal Rules of Criminal Procedure rules 3 and 54.

AFFIDAVIT

I, T. Sean Norman, being duly sworn, depose and state as follows:

1. I am employed as a Special Agent with the Federal Bureau of Investigation. I have been employed by this agency for eleven years, and I have ten years of experience in the enforcement of identity theft offenses. I am presently assigned to the Philadelphia Field office which investigates financial crimes, among other violations of Federal law.

2. The information within this Affidavit is based upon my personal experience, knowledge and observations, as well as witness interviews, information, records and surveillance photographs supplied to me by Citizen Bank and local law enforcement agencies. What follows is not all of the information I have uncovered during my investigation.

3. Since 2017, the Federal Bureau of Investigation ("FBI") has been investigating an identity theft scheme targeting account holders of Citizens Bank for which account information for the account holders had been illegally obtained from a bank employee.

4. During this investigation, the FBI obtained, from investigators for Citizens Bank, bank records for fraudulent withdrawals from a number of Citizens Bank personal accounts victimized by this scheme and surveillance photographs of "runners," participants in the scheme who went into bank branches and, using fraudulent identification in the names of the account holders, made fraudulent withdrawals from the victims' accounts.

5. I have reviewed Citizens Bank records and surveillance photographs of the some of the fraudulent transactions conducted and attempted against the accounts of the victims and arrest photographs of RANIN ELGAMAL and VLADIMIR LAHENS and I recognize

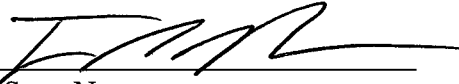
ELGAMAL and LAHENS as two of the runners in this bank fraud scheme.

6. On or about the following dates, RANIN ELGAMAL and VLADIMIR LAHENS presented, at Citizens Bank branches, fraudulent identification with the names of Citizens Bank account holders and made the following fraudulent withdrawals against the Citizens accounts of those account holders:

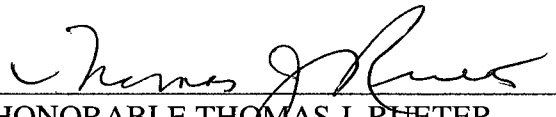
<u>DATE</u>	<u>RUNNER</u>	<u>LOCATION</u>	<u>ACCOUNT HOLDER &amp; RESIDENCE LOCATION</u>	<u>WITHDRAWAL AMOUNT</u>
04/12/17	LAHENS	Stamford, CT	G.G., Philadelphia, PA	\$5,000
04/14/17	LAHENS	Middletown, NY	R.W., Philadelphia, PA	\$5,000
04/14/17	LAHENS	Bloomington, NY	T.Z., Pennlyn, PA	\$5,000 attempt
04/14/17	LAHENS	Port Jervis, NY	R.W., Philadelphia, PA	\$5,000 attempt
04/14/17	LAHENS	Matamoras, PA	R.W., Philadelphia, PA	\$5,000 attempt
04/14/17	LAHENS	Milford, PA	R.W., Philadelphia, PA	\$5,000 attempt
04/28/17	ELGAMAL	North Kingston, RI	A.N., Philadelphia, PA	\$5,000
04/28/17	ELGAMAL	East Greenwich, RI	B.H., Coraopolis, PA	\$5,000 attempt
04/28/17	ELGAMAL	Coventry, RI	A.N., Philadelphia, PA	\$5,000 attempt

7. At the time of these offenses, Citizens Bank was a federally insured financial institutions doing business in interstate commerce.

8. Based on the above facts, there is probable cause to believe that ELGAMAL RANIN and VLADIMIR LAHENS committed, and aided and abetted, bank fraud and aggravated identity theft, in violation of 18 U.S.C. §§ 1344, 1028A and 2.

  
\_\_\_\_\_  
T. Sean Norman  
Special Agent  
Federal Bureau of Investigation

Sworn and Subscribed before me  
this 19 of June, 2017

  
\_\_\_\_\_  
HONORABLE THOMAS J. RUETER  
*United States Magistrate Judge*